

REMARKS/ARGUMENTS

Claims 1, 4-9, 11, and 27-29 are pending in the present application. Claims 2, 12-13, 15-20, and 22-26 were canceled; claims 1, 4, 5, 7, and 8 were amended; and claims 27-29 were added. In this amendment, Applicant has amended claims 1 and 8 and canceled claims 12-13, 15-20, and 22-26 from further consideration in this application. Applicant is not conceding that the subject matter encompassed by claims 12-13, 15-20, and 22-26 is not patentable. Claims 12-13, 15-20, and 22-26 were canceled in this Amendment solely to facilitate expeditious prosecution of the remaining claims. Applicant respectfully reserves the right to pursue additional claims, including the subject matter encompassed by claims 1 and 8, as presented prior to this Amendment, as well as canceled claims 12-13, 15-20, and 22-26, in one or more continuing applications. Support for the amendments to the claims and the newly added claim can be found in the Specification at least in paragraph [0002], [0009], [0033], [0037], [0046], and [0049]. Reconsideration of the claims is respectfully requested.

I. Examiner Interview

Applicant thanks Examiner Nguyen for all the courtesies extended Applicant's representative during the March 31, 2008 telephone interview. During the interview, Applicant's representative discussed the prior art of record and the manner in which the cited references fail to teach or suggest the features in the claims. The Examiner indicated that she would consider the arguments and claim amendments when submitted. The arguments discussed as well as additional reasons that the claims are not anticipated are set forth in the remarks below.

II. Objection to Claims

The examiner has stated that claims 2, 12, and 24 were objected to due to informalities. In response, claim 2 has been amended to overcome this objection. Claims 12 and 24 were canceled. Therefore, the objection to the claims has been overcome.

III. 35 U.S.C. § 112, Second Paragraph

The examiner has rejected claims 5 and 7 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter, which applicants regard as the invention. In particular, the Examiner notes that the limitation "the original first document" lacks antecedent basis. However, claim 5 was amended to change the original first document to "first

document” in the Response to Office Action filed on November 7, 2006. Therefore, claim 5 is not indefinite.

The Examiner also believes the limitation “a normal display space for the original first document” in claim 7 is indefinite because it is unclear if it is referring to the normal display space for the original first document in claim 5. However, in the Response to Office Action filed on November 7, 2006, claim 7 was amended to change “the original first document” to “the first document. Therefore, claim 7 is not indefinite. This rejection is respectfully traversed.

Therefore the rejection of claims 5 and 7 under 35 U.S.C. § 112, second paragraph has been overcome.

IV. 35 U.S.C. § 103, Obviousness

The examiner has rejected claims 1-2, 4, 12-13, 15 and 23-24 under 35 U.S.C. § 103 as being unpatentable over *Lloyd-Jones et al.* (US 7073128, filed 01/2001, priority January 31, 2000) in view of *Cline* (US 5721851, filed Feb 24, 1998). This rejection is respectfully traversed.

As to claim 1, the examiner states:

Lloyd-Jones teaches method for magnifying a portion of a document in a browser on a client (see the Abstract), comprising:

- presenting a first document in a first display in the browser on the client (col. 4, lines 18-50, col. 6, line 61 - col. 7, line 8, fig. 4 and associated text);
- generating a magnified display of the first document in memory at the client (col. 4, lines 18, col. 5, line 65 - col. 6, line 60, fig.4 and associated text);
- displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document (col. 5, lines 11-64 and col. 6, lines 28-60).

Lloyd-Jones, however, does not specifically teach "mapping the selected portion of the magnified display to a display space of the selected portion of the first document; response to receiving a request for an action within the second display; and performing the action with respect to the first document. "

Cline teaches mapping the selected portion of the magnified display to a display space of the selected portion of the first document; response to receiving a request for an action within the second display; and performing the action with respect to the first document (col. I, lines.38-54, col. 3, lines 7-57).

It would have been obvious to one of ordinary skill in the art at the time of the invention was made to modify Lloyd-Jones with Cline because it would have provided a visual indication as to where active links are located within a document.

Office Action dated December 31, 2007, pages 5-6.

The Examiner bears the burden of establishing a *prima facie* case of obviousness based on prior art when rejecting claims under 35 U.S.C. § 103. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). The prior art reference (or references when combined) must teach or suggest all the claim limitations. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). In determining obviousness, the scope and content of the prior art are... determined; differences between the prior art and the claims at issue are... ascertained; and the level of ordinary skill in the pertinent art resolved. Against this background the obviousness or non-obviousness of the subject matter is determined. *Graham v. John Deere Co.*, 383 U.S. 1 (1966). Often, it will be necessary for a court to look to interrelated teachings of multiple patents; the effects of demands known to the design community or present in the marketplace; and the background knowledge possessed by a person having ordinary skill in the art, all in order to determine whether there was an apparent reason to combine the known elements in the fashion claimed by the patent at issue. *KSR Int'l. Co. v. Teleflex, Inc.*, No. 04-1350 (U.S. Apr. 30, 2007). Rejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness. *Id.* (citing *In re Kahn*, 441 F.3d 977, 988 (CA Fed. 2006)).

IV.A. Claim 1

Amended claim 1 is as follows:

1. A method for magnifying a portion of a document in a browser on a client, comprising:
 - presenting a first document in a first display in the browser on the client;
 - generating a magnified display of the first document in memory at the client;
 - displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document, wherein the second display is a magnifier window within the first display;
 - mapping the selected portion of the magnified display in the second display to a display space of the selected portion of the first document; and
 - responsive to receiving a selection of a link within the selected portion of the magnified display in the second display, retrieving a second document corresponding to the link and displaying the second document in the first display; and
 - responsive to receiving a selection of a portion of text within the selected portion of the magnified display in the second display to be copied and pasted into a third document associated with a different application, copying the portion of the text selected within the selected portion of the magnified display and pasting the portion of the text into the third document associated with the different application, wherein an action within the selected portion of the

magnified display in the second display results in performing an action with respect to the original document, wherein the selected portion of the magnified display displayed in the magnifier window retains full browser functionality.

IV. A.i. The proposed combination of references, considered as a whole, does not teach or suggest the feature of “displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document, wherein the second display is a magnifier window within the first display,” as in claim 1.

The Examiner failed to state a *prima facie* obviousness rejection against claim 1 because the proposed combination of references, considered as a whole, does not teach or suggest the feature of, “displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document, wherein the second display is a magnifier window within the first display,” as in claim 1. The Examiner asserts otherwise, citing from the following portions of *Lloyd-Jones*:

Accordingly, at the highest hierarchical level, the selected section is that of "holidays" as depicted by the reference numeral 402. The selected child 404 associated with the section 402 is identified as "Cairns '98", which represents a tape (e.g., 102 in FIG. 1) which has been classified in the holidays section. Within the tape 404, there are a number of scenes 406, . . . , 408. The scene 406 displays a small square 430 with a "+" at its top right hand corner, this "+" indicating that "child" information is "hidden" within the scene 406 but is not displayed on the GUI. In contrast, the scene 408 shows an empty square 432 at its top right hand corner, this indicating that the child information contained within the scene 408 is displayed on the GUI as clips 410, . . . , 412. In a similar fashion, the final clip 412 displays an empty box 434 at its top right hand corner, indicating that its child, i.e., the "object" residing within the clip, is displayed in the GUI as object 414 displayed in the GUI.

Lloyd-Jones at column 5, lines 10-27.

Here, *Lloyd-Jones* describes hierarchical levels associated with video. The levels include the selected section, scenes, clips, and objects. A "+" symbol indicates that information is hidden within a scene that is not displayed. *Lloyd-Jones* does not describe a selected portion of a magnified display in a magnifier window or second display within a first display.

Lloyd-Jones at column 5, lines 28-32 states:

The particular representation of the hierarchical information ranging from the holiday section 402 down to the object 414 is a convenient arrangement which allows the user of the GUI to select a particular hierarchical level for "conceptual magnification".

This paragraph of *Lloyd-Jones* indicates that the hierarchical information ranging from the selected section, holiday section, to the object allows the user to select a hierarchical level for

magnification. During magnification, a frame representative of the selected hierarchical level is displayed. *Lloyd-Jones* at column 5, lines 33-64 teaches:

Selection of the desired hierarchical level can be performed with the pointer 422 (by using the mouse 503 etc. as already described). This pointer is arranged to "travel" on a circular track 424, in a manner dictated by the "invisible" radius 426, directed by the user appropriately "clicking and dragging" the pointer 422 using the mouse 503. When the user adjusts the radial orientation of the pointer 422, this adjustment, which changes the radial orientation of the pointer 422 relative to the representations of the hierarchical data 402, 404, . . . , points to, and thus selects the hierarchical data item (402, 404, . . .) which most closely intersects the extended radial line 426 in the chosen orientation. In other words, the user is able to select a desired hierarchical level by radial adjustment of the pointer 422. Having selected the desired item, the embodiment automatically presents a frame representative of the selected hierarchical level, in conjunction with frames representative of the child hierarchical level. Such representative frames can be "key" frames, ie those frames designated by some process as being particularly representative. Alternatively, some other mechanism for determining representative frames can be used. To continue therefore, if the user selects the scene 408, then a representative frame (eg a key frame) for the scene 408 will be displayed, in conjunction with representative frames (eg key frames) for each of the child clips 410, . . . 412. The user is able to conceptually magnify, i.e., to "drill down", into the scene 408, and to view representative frames for the individual clips 410, . . . , 412, which make up the scene 408. This conceptual magnification is performed simply, and in an intuitive manner, making the browsing of video content practical and convenient, even when applied in relation to large amounts of video data.

As shown above, the "magnification" of *Lloyd-Jones* simply displays a video frame that is representative of a hierarchical level selected by a user. The magnification does not magnify a portion of a video frame or a portion of a document. Instead, *Lloyd-Jones* simply displays a key frame or representative frame for a selected hierarchical level. Although *Lloyd-Jones* uses the term "magnify" to describe the process of displaying a video frame, *Lloyd-Jones* does not teach or suggest magnifying a document or displaying a portion of a magnified document. *Lloyd-Jones* appears to use the term magnify to refer to displaying a video frame in the browser. *Lloyd-Jones* does not teach or suggest displaying a selected portion of a magnified display of a first document in a magnifier window within a first display that presents the first document in the browser on the client.

The Examiner also cites to *Lloyd-Jones* at column 6, lines 28-38 which discloses:

In accordance with a second embodiment, instead of conceptually magnifying a representative frame of the parent hierarchical level, in conjunction with representative frames of all the associated child levels, it is possible to view representative frames from all items on the same hierarchical level (e.g. 300, . . . , 304 in FIG. 3). This option can be selected at any level by the user. In addition, upon reaching the "bottom" of the hierarchical data structure, since the bottom

level has no children, representative frames from all items on the same hierarchical level are automatically conceptually magnified, ie viewed.

In this cited portion of the reference, *Lloyd-Jones* describes viewing representative frames from all items on the same hierarchical level. Representative frames from all items on the same hierarchical level are automatically viewed when the bottom of the hierarchical structure is reached. Again, *Lloyd-Jones* indicates that the term “magnified” merely refers to displaying or viewing a video frame for a selected hierarchical level. The magnification of *Lloyd-Jones* does not teach or suggest creating a magnified display of a document or displaying a portion of the magnified display of the document.

The Examiner also cites to *Lloyd-Jones* at column 6, lines 39-60 which is as follows:

The method of conceptually magnifying video browser data can be practiced using a conventional general-purpose computer system 500, such as that shown in FIG. 5 wherein the processes of FIG. 6 may be implemented as software, such as an application program executing within the computer system 500. In particular, the steps of the method of conceptually magnifying video browser data are effected by instructions in the software that are carried out by the computer. The software may be divided into two separate parts, one part for carrying out the browsing magnification methods, and another part to manage the user interface between the latter and the user. The software may be stored in a computer readable medium, including the storage devices described below, for example. The software is loaded into the computer from the computer readable medium, and then executed by the computer. A computer readable medium having such software or computer program recorded on it is a computer program product. The use of the computer program product in the computer preferably effects an advantageous apparatus for conceptually magnifying video browser data in accordance with the embodiments of the invention.

Here, *Lloyd-Jones* describes conventional general-purpose computer systems for implementing the system of *Lloyd-Jones*. However, as discussed above, the magnification of *Lloyd-Jones* appears to refer to viewing or displaying a video frame. *Lloyd-Jones* fails to teach or suggest “displaying in a second display in the browser a selected portion of the magnified display corresponding to a selected portion of the first document, wherein the second display is a magnifier window within the first display,” as is claimed in claim 1.

IV. A.ii. The proposed combination of references, considered as a whole, does not teach or suggest the feature of “mapping the selected portion of the magnified display in the second display to a display space of the selected portion of the first document,” as in claim 1.

The Examiner failed to state a *prima facie* obviousness rejection against claim 1 because the proposed combination of references, considered as a whole, does not teach or suggest the feature of, “mapping the selected portion of the magnified display in the second display to a display space of the

selected portion of the first document,” as in claim 1. The Examiner acknowledges that *Lloyd-Jones* does not teach this feature. However, the Examiner believes *Cline* teaches this feature at column 1, lines 38-54 which is as follows:

Accordingly, a uniquely programmed computer system, computer-implemented method, and computer readable memory embodying computer-readable detailed logic direct a computer system to display an image map having graphical objects thereon and an original appearance. At least a first portion of the graphical objects are links to other documents. The method includes the step of changing the original appearance of the first portion of the graphical objects to indicate that those graphical objects are links. This step is performed in response to user controls (e.g., a mouse cursor) being positioned on the image map.

Therefore, it is an object of the present invention to provide a UI (e.g., browser) that provides a temporary visual indication as to whether a picture is an image map.

It is a further object to provide a UI that provides a visual indication as to where active areas (i.e., links) are located within an image map.

Here, *Cline* discloses an image map having links to other documents. The original appearance of the graphical objects on the image map is changed to indicate that the graphical objects are links to other documents. Thus, an image map is a link to a document. The image map does not map a selected portion of **a magnified display** in a magnifier window in a first document to a display space of the first document. The Examiner also cites to *Cline* at column 3, lines 7-30 which states:

FIG. 3 illustrates a flowchart of-detailed logic in accordance with the present invention. At 330, the client sends a request to the server to read a HTML document that contains an image map. Within the request headers that the client sends to the server will be information indicating that the client supports image map configuration files. At 340, the server responds to the request by sending response headers that describe the information being sent back to the client including the HTML document, the image map image file, and the image map configuration file. At 350, the client stores the image map configuration file within RAM 14. Continuing at FIG. 4, at 302, the client parses the image map configuration file. The image map configuration file contains the default arrangement and descriptive information of the graphical objects present in image map 200. Descriptive information includes the name of the object, the dimensions of the image (e.g., icon) representing the object, the location of the object Within image map 200, whether the object or part of the object is an active area (and, therefore, a link), and if the object is an active area, the commands necessary to activate the link. Several conventional desktops utilize configuration files and, therefore, they are well known in the computer arts. The client parses the configuration file into system-recognizable data.

Here, *Cline* describes an image map configuration file that describes the name of the object, dimensions and location of the object, whether the object is an active link, and so on. The Examiner also cites to *Cline* at lines 3-45 which states:

At 304, the UI stores the dimensions/screen coordinates and active/inactive status of each graphical object into an image object list in the UI and, at 306, displays image map 200 to the screen. At 308, the UI monitors the coordinates of the mouse cursor. At 310, if the user moves the mouse cursor over image map 200, the UI examines the image object list to determine if any of the objects in image map 200 are active areas. If so, at 312, the UI creates a three-dimensional view of the active areas, thereby giving the active area a button-like look and feel. Alternatively, the UI may dim all inactive areas. The UI continues to monitor the position of the mouse cursor. Should the user move the mouse cursor off image map 200, the UI returns image map 200 to its original appearance.

Here, *Cline* teaches that the image map is displayed on the screen. If a user moves the cursor over an active area of an image map, a three-dimensional view of the active areas is created to give the active area a button-like look and feel. However, the alteration of the appearance of the image map does not teach or suggest mapping a portion of a magnified display to a display space of the first document.

Finally, the Examiner cites to column 3, at lines 45-57, which states:

At 314, if the mouse cursor is still over image map 200, the UI waits for an event to occur over image map 200 (e.g., click over active area). If detected, at 316, the UI retrieves the X, Y coordinates of the event from a queue (not shown). At 318, the UI determines if the X, Y coordinates are within any graphical object dimensions retrieved from the image object list (i.e., did the user click on a valid graphical object). If not within the dimensions, the UI continues to monitor events.sub.--. If within the dimensions, at 320, the UI examines the status of the selected graphical object from the image object list to determine if it is an active area. If an active area, at 322, the UI activates the link. In not an active area, at 324, the UI ignores the event.

Here, *Cline* indicates that if an event occurs over an active area of an image map, the link is activated. Again, the image map of *Cline* appears to be a link in one document to a second document. *Cline* does not teach or suggest mapping a portion of a magnified display in a magnifier window within a first display presenting a first document. In fact, *Cline* does not even mention magnifying a document or a magnifier window or second display within a first display. Thus, *Cline* fails to teach or suggest “mapping the selected portion of the magnified display in the second display to a display space of the selected portion of the first document,” as in claim 1.

IV. A.iii. The proposed combination of references, considered as a whole, does not teach or suggest the feature of “responsive to receiving a selection of a link within the selected portion of the magnified display in the second display, retrieving a second document corresponding to the link and displaying the second document in the first display; and responsive to receiving a selection of a portion of text within the selected portion of the magnified display in the second display to be copied and pasted into a third document associated with a different application, copying the portion of the text selected

within the selected portion of the magnified display and pasting the portion of the text into the third document associated with the different application, wherein an action within the selected portion of the magnified display in the second display results in performing an action with respect to the original document, wherein the selected portion of the magnified display displayed in the magnifier window retains full browser functionality,” as in claim 1.

The Examiner failed to state a *prima facie* obviousness rejection against claim 1 because the proposed combination of references, considered as a whole, does not teach or suggest the feature of, “responsive to receiving a selection of a link within the selected portion of the magnified display in the second display, retrieving a second document corresponding to the link and displaying the second document in the first display; and responsive to receiving a selection of a portion of text within the selected portion of the magnified display in the second display to be copied and pasted into a third document associated with a different application, copying the portion of the text selected within the selected portion of the magnified display and pasting the portion of the text into the third document associated with the different application, wherein an action within the selected portion of the magnified display in the second display results in performing an action with respect to the original document, wherein the selected portion of the magnified display displayed in the magnifier window retains full browser functionality,” as in claim 1. In rejecting claim 1 prior to this amendment, the Examiner cited to *Cline* at column 1, lines 38-54 and column 3, lines 7-57, which are quoted above. As discussed above, these cited portions of *Cline* teach an image map. When a mouse cursor is over an active area of an image map, a link to another document is activated. In other words, *Cline* is teaching selecting an image map in one document to link to a different document. The link in *Cline* is not a link in a magnifier window or a second display within a first display. *Cline* does not teach receiving a selection of a link in a selected portion of a magnified display in a magnifier window within a first display. Moreover, none of the cited references teaches or suggests receiving a selection of a portion of text within the selected portion of the magnified display to be copied and pasted into a third document in a different application.

In addition, neither *Cline* nor the other cited references teaches or suggests that **a portion of a magnified display in a magnifier window** within a first display that is presenting a first document **retains full browser functionality**. Thus, the combination of references, when considered as a whole, fails to teach or suggest “responsive to receiving a selection of a link within the selected portion of the magnified display in the second display, retrieving a second document corresponding to the link and displaying the second document in the first display; and responsive to receiving a selection of a portion of text within the selected portion of the magnified display in the second display to be copied and pasted into a third document associated with a different application, copying the portion of the text selected within the selected portion of the magnified display and pasting the portion of the text into the third document associated with the

different application, wherein an action within the selected portion of the magnified display in the second display results in performing an action with respect to the original document, wherein the selected portion of the magnified display displayed in the magnifier window retains full browser functionality,” as in claim 1.

IV.B. Dependent claims 4-9 and 27

Claims 4-9 and 27 are dependent on claim 1. Therefore, claims 4-9 and 27 are not obvious over the cited prior art at least by virtue of their dependency on claim 1. In addition, claims 4-9 and 28 recite additional combinations of features that are not taught or suggested by the cited prior art. For example, newly added claim 27 recites as follows:

27. The method of claim 1, wherein mapping the selected portion of the magnified display in the second display to a display space of the selected portion of the first document comprises: mapping mouse events occurring in the second display to corresponding coordinates in a normal display space associated with the first document in the first display.

As discussed above, the cited prior art references do not teach or suggest mapping a selected portion of a magnified display. *Lloyd-Jones* only teaches viewing or displaying a video frame representing a selected hierarchical level. *Cline* only teaches an image map used to link to a different document. *Cline* does not even mention a magnified portion of a document. *Lloyd-Jones* and *Cline* fail to teach or suggest mapping a portion of a magnified display to a display space of a selected portion of a first document or mapping mouse events occurring in the second display to corresponding coordinates in a normal display space associated with a first document in a first display.

IV.C. Claim 8

Claim 8 is as follows:

8. A method for magnifying a portion of a document in a browser, comprising:
presenting a first document in a first display in the browser, wherein the first document is display with an original font size;
receiving a selection of a portion of the first document for magnified display;
generating a magnified display of the selected portion from the structure of the first document to form a magnified portion, wherein the magnified display of the selected portion comprises text a second font size that is larger than the original font size;
analyzing a document object model for the first document;

identifying a portion of the document object model that corresponds to the selected portion of the first document, wherein the magnified display of the selected portion of the first document is generated at a client based on the corresponding portion of the document object model for the first document;
presenting the magnified display in a magnifier window within the first display;
receiving a request for an action within the magnified display in the magnifier window; and
performing the action with respect to the magnified display, wherein the magnified display presents a portion of the document object model, and wherein the selected portion of the magnified display retains full browser functionality within the magnifier window.

Claim 8 recites some subject matter discussed above with regard to claim 1. Therefore, claim 8 is not obvious over the cited prior art references for at least the reasons set forth above with regard to the similarly recited subject matter. In addition, claim 8 recites additional combinations of features that are not taught or suggested by *Lloyd-Jones* in view of *Cline* and in further view of *Szepesvary*. For example, the cited prior art references do not teach or suggest “generating a magnified display of the selected portion from the structure of the first document to form a magnified portion, wherein the magnified display of the selected portion comprises text in a second font size that is larger than the original font size.” As discussed above, the cited prior art references do not teach or suggest displaying a selected portion of a magnified display in a second display or a magnifier window. In addition, the cited prior art fails to teach or suggest that the magnified display comprises text in a second font size that is larger than the original font size of the first document in the first display.

IV.D. Dependent claims 9, 11, and 28

Claims 9, 11, and 28 are dependent on claim 8. Therefore, claims 9, 11, and 28 are not obvious over the cited prior art at least by virtue of their dependency on claim 1.

IV.E. The Examiner Fails to Present a *Prima facie* Case of Obviousness Because the Examiner Has Not Stated a Proper Reason to Combine the References.

Additionally, the Examiner failed to state a *prima facie* obviousness rejection against claim 1 because the Examiner failed to state a proper reason to combine the references under the standards of *KSR Int’l*. As shown above, *Lloyd-Jones* and *Cline* simply do not teach or suggest what the Examiner believes these references to teach and suggest. Therefore, the reasoning provided by the Examiner to combine the references rests on inherently flawed reasoning. For this reason, the Examiner did not state a proper, rational reason to combine the references as required by *KSR Int’l*. Accordingly, the Examiner failed to state a *prima facie* obviousness rejection against claim 1 or any other claim in this grouping of claims.

IV.F. *Lloyd-Jones* Teaches Away from the Invention of Claim 1

Lloyd-Jones teaches away from the invention in claim 1 where *Lloyd-Jones* teaches that magnifying is performed by displaying representative video frames for selected hierarchical levels to allow a user to drill down into a video scene rather than displaying **a portion** of a magnified display in a magnifier window within a first display. In other words, *Lloyd-Jones* displays video frames rather than generating a magnified display and displaying only a portion of the magnified display. Thus, *Lloyd-Jones* teaches away from the invention in claim 1.

Therefore, the rejection of claims 1-2, 4, 12-13, 15 and 23-24 under 35 U.S.C. § 103 has been overcome.

V. Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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